IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| IN RE TRICOR DIRECT PURCHASER ANTITRUST LITIGATION |)) C. A. No. 05-340 (KAJ) (consolidated) |
|---|---|
| THIS DOCUMENT RELATES TO: |))) |
| IN RE TRICOR INDIRECT PURCHASER |))) C. A. No. 05-360 (KAJ) |
| ANTITRUST LITIGATION |) (consolidated)) |
| THIS DOCUMENT RELATES TO: |) |
| ALL ACTIONS |) _) |

NOTICE OF TAKING THE VIDEO-TAPED DEPOSITION OF LAURENCE BRUGERE

PLEASE TAKE NOTICE that, pursuant to the Federal Rules of Civil Procedure,
Plaintiffs in the above-referenced action will take the video-taped deposition upon oral
examination of Laurence Brugere. This deposition will occur as follows:

| <u>Date</u> | <u>Time</u> | Place |
|--------------------|-------------|---|
| September 21, 2006 | 9:30 a.m. | Rosenthal, Monhait & Goddess, P.A. Suite 1401, 919 Market Street Wilmington, Delaware 19899 |

The testimony of the witness will be video-taped and will be recorded and transcribed by a court reporter. The deposition will continue from day to day until completed. All counsel are invited to attend and cross-examine.

Dated: August 30, 2006

Respectfully submitted,

/s/ Jeffrey S. Goddess

Jeffrey S. Goddess (Del. Bar No. 630) Jessica Zeldin (Del. Bar No. 3558) Rosenthal, Monhait & Goddess, P.A. 919 Market Street, Suite 1401 P.O. Box 1070 Wilmington, DE 19899-1070 jgoddess@rmgglaw.com jzeldin@rmgglaw.com (302) 656-4433

/s/ Elizabeth M. McGeever

Elizabeth M. McGeever (Del. Bar No. 2057)
Prickett Jones & Elliott, P.A.
1310 King Street
P.O. Box 1328
Wilmington, DE 19899
emmcgeever@prickett.com
(302) 888-6521
Counsel for Walgreen Co., Eckerd Corporation,
The Kroger Co., Maxi Drug, INC. d/b/a Brooks
Pharmacy, Albertson's Inc., Safeway, Inc.,
Hy-Vee, Inc., American Sales Company, Inc.
CVS Pharmacy, Inc., Rite Aid Corporation and Rite
Aid Hdqrts. Corp.

/s/ A. Zachary Naylor

A. Zachary Naylor (Del. Bar No. 4439) Chimicles & Tikellis LLP One Rodney Square P.O. Box 1035 Wilmington, DE 19899 zacharynaylor@chimicles.com (302) 656-2500 Liaison Counsel for Indirect Purchaser Class

/s/ Jonathan L. Parshall

Jonathan L. Parshall (Del. Bar No. 3247)
Murphy, Spadaro & Landon
1011 Centre Road, Suite 210
Wilmington, DE 19805
jonp@msllaw.com
(302) 472-8100
Attorneys for Pacificare Health Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2006 I electronically filed the foregoing document using CM/ECF, which will send notification of such filing to all registered participants, including:

Josy W. Ingersoll, Esquire John W. Shaw, Esquire Karen Keller, Esquire Young Conaway Stargatt & Taylor The Brandywine Building 1000 West Street, 17th Floor P. O. Box 391 Wilmington, DE 19899-0391 Mary B. Graham, Esquire Morris Nichols Arsht & Tunnell 1201 North Market Street P. O. Box 1347 Wilmington, DE 19899

Frederick L. Cottrell, III, Esquire Anne Shea Gaza, Esquire Richards Layton & Finger One Rodney Square 920 North King Street Wilmington, DE 19801 Mary B. Matterer, Esquire Morris James Hitchens & Williams 222 Delaware Avenue 10th Floor P. O. Box 2306 Wilmington, DE 19899

Pamela S. Tikellis, Esquire Robert J. Kriner, Jr., Esquire A. Zachary Naylor, Esquire Chimicles & Tikellis ILP One Rodney Square P. O. Box 1035 Wilmington, DE 19899 Jonathan L. Parshall, Esquire Murphy Spadaro & Landon 1011 Centre Road Suite 210 Wilmington, DE 19801

Elizabeth M. McGeever, Esquire Prickett Jones Elliott, P.A. 1310 King Street P. O. Box 1328 Wilmington, DE 19899

Michael I. Silverman, Esquire Lynn A. Iannone, Esquire Silverman & McDonald 1010 N. Bancroft Parkway #22 Wilmington, DE 19805 Patrick Francis Morris, Esquire Morris & Morris 1105 North Market Street Suite 803 Wilmington, DE 19801

I hereby certify that on August 30, 2006 I sent by electronic mail the foregoing document to the following non-registered participants:

REPRESENTING DIRECT PURCHASER CLASS (C.A. No. 05-340):

Bruce E. Gerstein bgerstein@garwingerstein.com

Barry S. Taus btaus@garwingerstein.com

Adam M. Steinfeld asteinfeld@garwingerstein.com

Rimma Neman rneman@garwingerstein.com

Daniel Berger danberger@bm.net

Eric L. Cramer ecramer@bm.net

Peter Kohn pkohn@bm.net

Neill W. Clark nclark@bm.net

Linda P. Nussbaum Inussbaum@cmht.com

Steig D. Olson solson@cmht.com

David P. Germaine dgermaine@daarvanek.com

Joseph Vanek jvanek@daarvanek.com

Stuart Des Roches stuart@odrlaw.com

Andrew Kelly akelly@odrlaw.com

Adelaida Ferchmin aferchmin@odrlaw.com

David P. Smith dpsmith@psfllp.com

Russell A. Chorush rchorush@hpcllp.com

Michael F. Heim mheim@hpcllp.com

REPRESENTING WALGREEN, ECKERD, KROGER, MAXI, CVS, RITE AID (C.A. No. 05-340):

Elizabeth M. McGeever emmcgeever@prickett.com

Scott E. Perwin sperwin@kennynachwalter.com

Lauren Ravkind lravkind@kennynachwalter.com

Joseph T. Lukens jlukens@hangley.com

REPRESENTING PACIFICARE (C.A. No. 05-340):

Jonathan L. Parshall jonp@msllaw.com

William Christopher Carmody bcarmody@susmangodfrey.com

John Turner

jturner@susmangodfrey.com

Shawn Rabin

srabin@susmangodfrey.com

Justin Nelson

jnelson@susmangodfrey.com

Ken Zylstra

kzylstra@sbclasslaw.com

Lyle Stamps

lstamps@sbclasslaw.com

Steve Connolly

sconnolly@sbclasslaw.com

Casey Murphy

cmurphy@sbclasslaw.com

Mark Sandman

mms@rawlingsandassociates.com

Jeffrey Swann

js5@rawlingsandassociates.com

REPRESENTING IMPAX

LABORATORIES (C.A. No. 03-120)

Mary Matterer

mmatterer@morrisjames.com

John C. Vetter

jvetter@kenyon.com

Asim Bhansali

abhansali@kvn.com

REPRESENTING INDIRECT PARTY PLAINTIFFS (C.A. No. 05-360):

Pamela S. Tikellis Thomas M. Sobol Patrick E. Cafferty Jeffery L. Kodroff

Bernard J. Persky Michael Gottsch A. Zachary Naylor

Robert Davis Brian Clobes

Michael Tarringer

Tim Fraser David Nalven Greg Matthews

Christopher McDonald

Kellie Safar Ted Lieverman Pat Howard

tricor@chimicles.com

Michael I. Silverman mike@silverman-mcdonald.psemail.com

Lynn A. Iannone lynn@silverman-mcdonald.psemail.com

Patrick Francis Morris

pmorris@morrisandmorrislaw.com

REPRESENTING TEVA

PHARMACEUTICALS (C.A. No. 02-1512):

Josy W. Ingersoll Bruce M. Gagala Karen E. Keller

Christopher T. Holding

Ken Cohen Elaine Blais tricor@ycst.com

REPRESENTING ABBOTT (ALL CASES):

Mary B. Graham tricor@mnat.com

William F. Cavanaugh wfcavanaugh@pbwt.com

Chad J. Peterman

cjpeterman@pbwt.com

REPRESENTING FOURNIER (ALL CASES):

Frederick L. Cottrell, III Anne Shea Gaza Steven S. Sunshine Matthew P. Hendrickson Bradley J. Demuth Maggie DiMoscato Timothy C. Bickham tricor@rlf.com

/s/ Jeffrey S. Goddess

Jeffrey S. Goddess (Del. Bar No. 630) Jessica Zeldin (Del. Bar No. 3558) Rosenthal, Monhait & Goddess, P.A. Suite 1401, 919 Market Street P. O. Box 1070 Wilmington, DE 19899-1070 (302) 656-4433 jgoddess@rmgglaw.com jzeldin@rmgglaw.com